Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of

PUBLIC SAFETY AND HOMELAND SECURITY BUREAU SEEKS COMMENT ON OPTIONS FOR 470-512 MHz (T-BAND) SPECTRUM	)))	**PS DOCKET NO. 13-42**

COMMENTS OF THE
INTERAGENCY COMMUNICATIONS INTEROPERABILITY SYSTEM (ICIS)
A California Joint Powers Authority Agency

The Interagency Communications Interoperability System JPA submits the following comments to the Commission's Public Notice in the above-captioned proceeding concerning options for the 470 – 512 MHz (T-Band) spectrum.

The ICIS regional communications system fully supports 29 separate municipal public safety (Police & Fire/EMS) agencies located throughout the Los Angeles County region in Southern California. The system's 7 network cells and 26 strategically located high-level, high-power repeater sites utilize more than 80 channel pairs of T-Band spectrum providing nearly 100% coverage to several hundreds of square miles of populated urban and suburban area. There are several thousand first-responders immediately dependent upon the ICIS system and more than 20,000 subscriber units (individual radios) registered to the network.

ICIS is a system of systems. Our independent regional public safety communications systems (cells) are networked together under the ICIS umbrella and share a common master site, as well as comprehensive, redundant microwave looping. The system employs modern digital technologies and was constructed within the past ten years, with some cells still in

development. The entire system of systems is in the final phases of technical migration from a proprietary operating system to the Project-25 Phase-2 standard. The ICIS system has already narrow-banded in compliance with the Commission's original requirement of same.

The ICIS system provides highly dependable mission critical LMR communications for first responders delivering essential service public safety protection to several million residents and visitors every day. Additionally, the system is robust enough to support the full range of second responders and all ancillary communications needs of these same communities on a single platform, providing for seamless cross-discipline, multi-hazard communications on all levels.

The ICIS radio system is the only trunked digital interoperable public safety communications platform operating in the Los Angeles region today. Formally established as a Joint Powers Authority agency in 2003, the ICIS system was engineered and developed quickly and efficiently and began service only one year later in 2004. The ICIS system was designed, engineered, and constructed employing local funds, with no special taxes or assessments, and there is presently more than $80,000,000 invested. The cost of migration would far exceed that sum with which the system was originally developed.

It would make little sense to force the abandonment of robust and well-developed public safety communications platforms to simply replace them with an equal or lesser technology at great expense and with significant risk of disruption to local public safety services.

Public Law 112-96 is a well-intentioned economic stimulus package that unfortunately incorporates a severely under-funded mandate in the form of the T-band provision.

The T-band provision represents a potentially disastrous scenario for public safety by compromising first responder communications, interrupting critical service delivery, and placing

public safety agencies in the awkward position of having to replace perfectly good systems already employing highly viable spectrum.

Continuing with the auction of T-band spectrum, especially on the insufficient time-line set forth in Public Law 112-96, will deal a devastating blow to mission-critical public safety radio systems in at-risk population centers across the country.

A forced migration of public safety LMR systems from T-band to an alternative spectrum, such as 700/800 MHz, requires far more than a simple re-tuning of existing communications technology, it requires a complete re-engineering and replacement of entire radio systems, including base stations, repeater sites, connectivity, mobile radios, and portable handy-talkies. The cost of such system replacements will be staggering.

The coverage and penetration of 700/800 MHz spectrum is less than that of T-band, necessitating the engineering and locating of additional repeater sites and in-structure antenna systems in order to maintain even par with existing T-band radio coverage for public safety. These additional systems will come at significant cost. Failure to compensate for spectrum inefficiency would put the public and first responders at further unnecessary risk.

The disruptions to public safety services will be very real. Radio system migration is a complex effort that comes fraught with operational challenges. There are always service interruptions during the course of system transitions and such interruptions can place the public and first responders in unnecessary peril, especially if the system transition is not a true necessity. Exchanging a robust radio communications system with what is simply an even less-robust radio communications system is certainly not an example of necessity the gravity of which would justify imperiling public safety operations.

There is also significant concern as to the availability of sufficient 700 MHz spectrum to accommodate the empirical communications demands of public safety in these affected regions.

The true costs of a T-band migration and system replacement will far exceed what the well-meaning authors of this legislation envisioned. The funds to be gained from an auction of the T-band will fall far short of the costs of any attempted system migration. This shortfall is projected to be in the billions of dollars.

The time frame set forth for complete migration is insufficient. Public safety radio systems take years to engineer, fund, procure, and construct. To afford for only a two-year migration period is quite frankly asking the near impossible.

A broadband (LTE) solution for LMR and public safety mission critical communications does not exist today but is likely well within the reach of our next generation. To migrate now from one LMR spectrum to another while employing dated technologies - and at great expense - when an emerging broadband (LTE) solution will compel yet another even more complete and perhaps more costly migration would be wholly unwarranted. It is seemingly wiser to maintain the status quo pending the arrival of a proven broadband (LTE) solution.

We concur wholeheartedly with the report and executive summary set forth March 15, 2013, by NPSTC on this matter. The T-band legislation, as enacted, is not feasible and serves no public interest.

We also feel the imposed moratorium on T-band licensing has had a crippling effect upon public safety. These are entities that are already starved for spectrum. Viable projects are stalled and system growth stunted in the wake of this imposed inaccessibility to viable spectrum.

It would be our desire that the FCC ask Congress to reconsider the T-band issue based upon the fact the program is fiscally infeasible and poses a risk to public safety.

Respectfully submitted,

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OTHER AGENCIES SERVED
The ICIS system is also the primary communications system for the Bob Hope Airport Police and Fire Departments, the Glendale College Police, the Foothill Air Support Team (FAST), and the California State Polytechnic University at Pomona Police (Cal-Poly). ICIS also provides regional radio coverage for the American Red Cross, Los Angeles Chapter.